

## The Steimel Law Group

Walter Steimel, Jr.  
Principal

March 13, 2017

VIA ECFS

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Docket No. WC 17-62  
Application of Megaphone, Inc.  
For Authorization to Obtain Numbering Resources

Dear Ms. Dortch:

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, Megaphone, Inc. ("Megaphone") respectfully submits the following additional information regarding, and clarification of, its Application to Obtain Numbering Resources, Docket No. WC 17-62 ("Application"), in response to an inquiry by Commission staff. It also attaches an amended Application incorporating the corrections and clarifications contained herein.

1. The interconnection agreement Megaphone provided with the Application makes reference to "termination." For clarification, this reference is for both inbound and outbound termination, that is, each of the interconnected carriers can terminate both ends of two-way communications to each other. The interconnection agreement makes no reference to either inbound or outbound services, as all services are two-way.

Megaphone and its interconnected carrier have not revised their interconnection agreement as the current agreement provides for both inbound and outbound call interconnection and permits completely interconnected two-way communications with the PSTN.

The original Application, however, did contain only a reference to "inbound" connectivity. This reference was in error and was inadvertent. Accordingly, we have amended Section I. (D) of the Application to correct this inadvertent reference and correct it to explicitly state both "inbound" and "outbound." The corrected sentence now reads –

As proof of its facilities readiness, Megaphone has attached to this application (1) an interconnection agreement between Megaphone and a carrier partner providing that the carrier partner will host Megaphone numbers on its switches and provide PSTN connectivity for both inbound and outbound calls to Megaphone numbers, and (2) demonstration that Megaphone's carrier partner maintains Feature Group D connections with an ILEC and is fully interconnected to the PSTN.

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2. We have amended the Application by changing the reference “primarily” on the second page to state “exclusively.” The statement now reads –

Megaphone will *exclusively* use numbers to provide voice over Internet protocol services. Applicant also provides the following information.... (emphasis provided)

3. We have also amended the Application by including the following statement immediately before the sentence referenced in point 2, above:

Megaphone is exclusively an interconnected VoIP service provider as defined by Section 9.3 of the Commission’s Rules, 47 C.F.R. § 9.3.

4. We have amended the Application by providing specific contact information for each of the Qualified Personnel identified in Section I. (A), and each of the Key Personnel identified in Section I. (F). Please see the amended Application for this contact detail.

5. In accordance with the strong suggestion contained in footnote 74 of *Numbering Policies for Modern Communications*, FCC 15-70 (rel. June 22, 2015), Megaphone clarifies in the new Exhibit C attached to its amended Application that the initial state in which Megaphone will be requesting numbers is Massachusetts, but that it may eventually request numbers in all fifty states. Megaphone acknowledges that it will file with each relevant state commission at least 30 days before making such requests.

6. Megaphone confirms that it has *no* foreign ownership.

Thank you for your attention to this matter. Please contact me with any further comments or questions.

Very truly yours,



Walter E. Steimel, Jr.

CC: Megaphone, Inc.

Attachment: Amended Application